

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 16-cr-88-jdp

CHARLES M. RAIMONDI, SR.,

Defendant.

**MOTION FOR MISCELLANEOUS RELIEF FOR POTENTIAL
COMPASSIONATE RELEASE MOTION**

Charles M. Raimondi, Sr., by counsel, moves for an order directing the Warden of the Federal Medical Center at Butner to produce to defense counsel and the United States Probation Office all of Mr. Raimondi's medical records from 2017 through 2020 and any petitions for compassionate release that he has filed.

The defense may move for compassionate release for Raimondi. For starters, he's 77 years-old. Plus, his placement at FMC Butner suggests that his health may have deteriorated since his 2017 sentencing. Put differently, it is unusual for non-infirm inmates to be held at an FMC.

Raimondi's age elevates his vulnerability to coronavirus, but he may have developed additional conditions that exacerbate it. His care-provider – the BOP – is in the best position to provide evidence of what those conditions may be. In order to make an appropriate case for compassionate release, the defense needs

the following: first, all medical records from the BOP concerning Raimondi; second, any records pertaining to his (or someone's on his behalf) petitioning the warden for compassionate release. Once those are received the defense will quickly file a brief supporting compassionate release – if the records support such a request. In addition, the defense will work with the United States Probation Department to formulate a release plan if he is granted compassionate release.

Thus, the defense respectfully requests that the Court order the Warden of the Federal Medical Center at Butner to turn over to the defense and the United States Probation Office all medical records pertaining to Raimondi and any petitions for compassionate release that he or anyone on his behalf has filed.

Dated at Madison, Wisconsin, this 6th day of May, 2020.

Respectfully submitted,

Charles M. Raimondi, Sr., Defendant

/s/ Peter R. Moyers
Peter R. Moyers

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